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## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Chapter 7

BARRY PORTNOY, : Case No. 14-16081-MDC

Debtor.

REPUBLIC FIRST BANK'S JOINDER IN TRUSTEE'S MOTION FOR ORDER AUTHORIZING ROBERT H. HOLBER, CHAPTER 7 TRUSTEE TO SELL REAL ESTATE LOCATED AT 1320B INDUSTRIAL BOULEVARD, UPPER SOUTHAMPTON, PA 18966 FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS AND FOR APPROVAL OF CARVE-OUT AGREEMENT WITH REPUBLIC FIRST BANK

Creditor, Republic First Bank, by and through counsel, submits the within Joinder to the Trustee's Motion to Sell Real Estate (ECF No. 342), and for all the reasons set forth therein, respectfully requests this Honorable Court grant the Motion and order the relief requested.

Date: September 23, 2016 By: /s/ Jonathan W. Hugg, Esquire

Jonathan W. Hugg Clark Hill PLC One Commerce Square 29005 Market Street, Suite 1000 Philadelphia, PA 19103 (215) 640-8547

Counsel for Republic Bank

## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and correct copies of the foregoing JOINDER IN TRUSTEE'S MOTION FOR ORDER AUTHORIZING ROBERT H. HOLBER, CHAPTER 7 TRUSTEE TO SELL REAL ESTATE LOCATED AT 1320B INDUSTRIAL BOULEVARD, UPPER SOUTHAMPTON, PA 18966 FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS AND FOR APPROVAL OF CARVE-OUT AGREEMENT WITH REPUBLIC FIRST BANK was served on September 23, 2016 on the following parties in this matter via this Court's electronic filing system and/or first-class mail:

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By: <u>/s/ Jonathan W. Hugg, Esquire</u> Jonathan W. Hugg, Esquire